EASTERN DISTRICT OF NEW YORK	
JOHN EDWARDS, Plaintiff, v.	x : : : NOTICE OF MOTION TO : ADMIT COUNSEL : PRO HAC VICE
THE CITY OF NEW YORK, AFP TRANSFORMERS, LLC, f/k/a INTERNATIONAL TRANSFORMERS, GEORGE G. SHARP, INC., MARINETTE MARINE CORPORATION AND FINCANTIERI MARINE GROUP, LLC	: : : : No. 1:10-cv-2624
Defendants.	: x

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto we will move this Court pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Brett Ingerman, a member of the firm of DLA Piper LLP (US) and a member in good standing of the Bar of the State of New York and the Bar of the State of Maryland, as attorney pro hac vice to argue or try this case in whole or in part as counsel for defendant Marinette Marine Corporation and Financtieri Marine Group, LLP. There are no pending disciplinary proceedings against me in any State or Federal court.

Dated: New York, New York

July 26, 2011

Respectfully submitted,

DLA Piper LLP (US)

By:

Brett Ingerman

DLA Piper LLP (US) 6225 Smith Avenue

Baltimore, Maryland 21209-3600

Telephone: (410) 580-3000 Facsimilie: (410) 580-3001

E-mail: brett.ingerman@dlapiper.com

Attorneys for Defendants Marinette Marine Corporation and Fincantieri Marine Group, LLC